

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4  
245 West Broadway, Suite 425  
Long Beach, CA 90802-4444

N00247.000322  
NTC SAN DIEGO  
SSIC #5090.3

CODE 18

February 20, 1996 1996 FEB 22 PM 2:19

Mr. Phillip Dyck  
BRAC Environmental Coordinator  
Naval Training Center-Environmental Office  
33502 Decatur Road, Suite 120  
San Diego, California 92133-5000

Dear Mr. Dyck:

**COMMENT RESOLUTION SHEET "RESPONSE TO AGENCY COMMENTS,"  
JANUARY 9, 1996, ON THE DOCUMENT TITLED DRAFT WORK PLAN SEDIMENT  
CHARACTERIZATION OF THE BOAT CHANNEL, DATED OCTOBER 1995, NAVAL  
TRAINING CENTER, SAN DIEGO, CALIFORNIA**

The Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB) have completed its review of the Navy's response to agency comments on the Draft Work Plan Sediment Characterization of the Boat Channel, dated October 1995, for Naval Training Center (NTC), San Diego. The comment resolution sheet was received by this office on January 23, 1996.

A letter from the RWQCB addressed to DTSC was sent to your office on February 7, 1996. Since the sending of that letter, we have had further internal discussions and we are transmitting the following recommendations and comments on the Navy response to regulator comments and the proposed changes to the work plan.

From the onset of our initial scoping, there was regulatory concern that the amount of sampling for the Boat Channel sediment characterization was minimal and may not be adequate, but the agencies agreed to work with the Navy and available resources to produce useful data. The Navy proposes coring to a maximum depth of six feet. While this depth is adequate for an ecological risk assessment, it may not be adequate to characterize the lateral and vertical extent of any sediment contamination. Significant contamination at depth from six foot cores will require additional sampling from the State. Preservation of the cores pending the initial analyses is recommended in case further characterization of the top six feet is necessary. In addition, as stated in the RWQCB letter, compositing of the samples for this study is not recommended.

In order to identify the Navy's contribution of contamination to the Boat Channel, the State recommends that all cores should extend through the entire estuarine deposits to the native soil contact. Please provide cost estimates to extend the core depth and rationale if the Navy is unable to extend drilling depths.




Mr. Phillip Dyck  
February 20, 1996  
Page 2

A number of informal discussions have taken place between the Navy, its subcontractors, the RWQCB, and DTSC during the scoping and development of this draft work plan. Informal discussions among individuals is welcomed and encouraged, however, when there is a significant change made to a document it is important that all project managers concur with proposed changes. During informal discussions with DTSC toxicologist Dr. Jim Polisini and the Navy contractor, it was agreed that the changes discussed concerning the number of analyses per core sample needed concurrence from the RWQCB project manager. Unfortunately, detailed discussion with the RWQCB regarding the proposed changes did not take place. Future changes should always go through the appropriate project managers.

Please respond to our comments accordingly. We look forward to the continued progress on the Boat Channel and NTC as a whole. If you have any questions or wish to discuss this matter further, please contact me at (310)590-5563.

Sincerely,



Alice Gimeno  
Base Closure Team  
Office of Military Facilities  
Southern California Operations

cc: Mr. Corey Walsh  
Regional Water Quality Control Board  
San Diego Region  
9771 Clairemont Mesa Boulevard, Suite B  
San Diego, California 92124-1331

Ms. Claire Trombadore  
Mr. Martin Hausladen  
U.S. Environmental Protection Agency  
Region IX, H-9-2  
Hazardous Waste Management Division  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Phillip Dyck  
February 20, 1996  
Page 3

cc: Mr. Jim Polisini, Ph.D.  
Office of Scientific Affairs  
Department of Toxic Substances Control  
400 P Street  
P.O. Box 806  
Sacramento, California 95812-0806

✓ Mr. Thomas Machiarella  
Mail Code 1832.TM  
Southwest Division Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5187